

DOCKETED

Docket Number:	19-HERS-01
Project Title:	2019 HERS Providers; Application for the 2019 Building Energy Efficiency Standards
TN #:	242606
Document Title:	CEC Response to CalCERTS Request For Clarification
Description:	This letter includes CEC staff's response to CalCERTS request for clarification on EDDS applications submitted on March 22, 2022 (TN# 242418)
Filer:	Daniel Wong
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	4/7/2022 2:07:42 PM
Docketed Date:	4/7/2022



April 7, 2022

Jennifer Brazell
CalCERTS, Inc.
31 Natoma Street, Suite 120
Folsom, CA 95630

RE: CalCERTS, Inc.'s Request for Clarification on EDDS Applications

Dear Jennifer Brazell:

The California Energy Commission (CEC) has received your letter dated March 22, 2022. In your letter, CalCERTS, Inc. has requested clarification regarding external digital data source (EDDS) applications and the associated approval process.

The following are staff's responses to your questions.

1. *Are all Authorized Users of the EDDS Diagnostic Tools or Software required to be disclosed in the EDDS Applications for Commission approval?*

2019 Joint Reference Appendix JA7 specifies the requirements for EDDS services and EDDS service approvals. JA7 does not require that the application specify or list authorized users¹ that will have access to an EDDS service.

2. *If approved EDD Diagnostic Tools or Software are made available to new categories of Authorized Users, such as alternate Rating Firms, Installers, Builders, will the Commission post amended notices to the Docket?*

EDDS service providers determine the authorized users that have access to their EDDS service and may change the authorized users that have access at their own discretion. JA7 does not require that the application disclose

¹ An "authorized user" is a person who has a user account with a data registry and is required to provide their correct username and password in order to access the data registry. Data registry users may be required to provide professional licensure, certification or credential information, or other qualifying information as condition of receiving authority to provide signatures for certain types of documentation.

authorized users that will have access to an EDDS. Therefore, changes to authorized user access does not require approval through the public process outlined in JA7.8 and 2019 Building Energy Efficiency Standards (Energy Code) section 10-110.

3. *Are amendments to the scope of Authorized Users for the EDD Diagnostic Tools or Software considered significant changes by the Commission with respect to the approval process?*

As previously noted, EDDS applications are not required to specify or list authorized users that will have access to an approved EDDS service therefore changes to EDDS authorized user access is outside the scope of the approval process outlined in JA7.8.

Changes to an approved EDDS application that are within the scope of regulations contained in JA7 will require approval through the process outlined in JA7.8 and 2019 Energy Code section 10-110. According to JA7.8, full approval is required when major changes are made to the functionality, security, or technology features that necessitate acceptance testing of more than 30 percent of the compliance document templates used in a CEC approved data registry. Amendments and revisions to existing data registry for which full approval is not required, may be approved through a streamlined process. Changes that qualify for streamlined approval include minor changes to the data registry document registration procedures, data input specifications and procedures, or registered compliance document output.

If you have any additional questions, please contact me at (916) 776-7186 or daniel.wong@energy.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Daniel Wong". The signature is written in a cursive, flowing style.

Daniel Wong
Senior Electrical Engineer